

**EXHIBIT**  
**E**

## ORAL AND VIDEOTAPED DEPOSITION OF CARLA COLLINS

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION  
C.M. COLLINS, N.J. LUNDY, §  
and R.C.L. MAYES, §  
Individually and on behalf §  
of all other similarly §  
situated, §  
§  
§  
Plaintiffs, §  
§  
VS. § NO. 4:22-cv-1073  
§  
CATASTROPHE RESPONSE UNIT, §  
INC. and CATASTROPHE §  
RESPONSE UNIT USA, INC., §  
§  
Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF  
CARLA COLLINS  
OCTOBER 19, 2023  
VOLUME 1

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## 1 APPEARANCES

2 FOR THE PLAINTIFFS:  
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11 FOR THE DEFENDANTS CATASTROPHE RESPONSE UNIT,  
12 INC. AND CATASTROPHE RESPONSE UNIT USA, INC.:

13 Mr. Monte K. Hurst  
14 Ms. Kristen A. Laster  
15 HALLETT & PERRIN, P.C.  
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18 Dallas, Texas 75202  
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21 Monte.Hurst@hallettperrin.com  
22 KBrumbalow@hallettperrin.com

## 23 ALSO PRESENT:

24 Ms. Cecili Morales  
25 Mr. David Repinski (via Zoom)  
Mr. Adam Dickens (via Zoom)  
Mr. John Hines, Videographer

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1 ORAL AND VIDEOTAPED DEPOSITION of CARLA  
2 MARIE COLLINS, produced as a witness at the instance  
3 of the Defendants, and duly sworn, was taken in the  
4 above-styled and numbered cause on the 19th of  
5 October, 2023, from 11:08 a.m. to 7:28 p.m., before  
6 Kathy E. Weldon, CSR in and for the State of Texas,  
7 reported by machine shorthand, at the offices of  
8 Hallett & Perrin, 1445 Ross Avenue, Suite 2400, in the  
9 City of Dallas, County of Dallas, State of Texas,  
10 pursuant to Notice and the Federal Rules of Civil  
11 Procedure.

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1 **over this dealership, agreed with me, and I was able**  
 2 **to get my down payment back.**

3 Q. The charges with regard to this matter, were  
 4 those dropped?

5 **A. Yes.**

6 Q. Okay. When I asked you about what criminal  
 7 matters you've been involved in, how come you didn't  
 8 mention any of this?

9 **A. I didn't remember. I forgot.**

10 Q. Let's talk about social media activity.

11 **A. Uh-huh.**

12 Q. You have a Facebook account, don't you?

13 **A. Yes.**

14 Q. In fact, you have multiple Facebook accounts,  
 15 don't you?

16 **A. Yes.**

17 Q. Under which names do you have Facebook  
 18 accounts?

19 **A. My name.**

20 Q. Okay. You have one under Carla Collins.

21 **A. Yes.**

22 Q. What else?

23 **A. Carla Marie.**

24 Q. Okay.

25 **A. And Shesus.**

1 Q. I'm sorry?

2 **A. Shesus, S-H-E-S-U-S.**

3 Q. Is that supposed to be a play on Jesus?

4 **A. Shesus, She's us.**

5 Q. What does that mean, Shesus? Like, you're a  
 6 different version of Jesus?

7 **A. No.**

8 Q. Well, how did you get the name Shesus?

9 **A. She's us.**

10 Q. She is us.

11 **A. Yes.**

12 Q. She's one of us?

13 **A. Yes.**

14 Q. She's a person of the people?

15 **A. Yes.**

16 Q. I understand.

17 Q. Okay. Are those the only three Facebook  
 18 accounts you've ever had?

19 **A. Yes.**

20 Q. Are you active in Facebook?

21 **A. Yes.**

22 Q. What does "active" mean to you?

23 **A. Do I engage.**

24 Q. Yes.

25 **A. Do I make posts.**

1 Q. How often do you make posts?

2 **A. Often.**

3 Q. How often?

4 **A. I -- I don't know the -- often.**

5 Q. Daily?

6 **A. No.**

7 Q. Weekly?

8 **A. Definitely weekly --**

9 Q. Okay.

10 **A. -- yes.**

11 Q. What are your posts about?

12 **A. Different things.**

13 Q. Yeah. Like what?

14 **A. Social injustice. I do -- whenever anyone in**  
 15 **the community reaches out to me to try to resolve the**  
 16 **matter, I act as the liaison. I work with multiple**  
 17 **police departments on trying to have a better**  
 18 **relationship with the community, specifically the**  
 19 **African-American community.**

20 I have helped them when they were looking  
 21 for persons who committed a crime, helping talk to  
 22 them to get them to turn themselves in. Help with  
 23 housing development, feeding those that are not able  
 24 or have a hard time feeding themselves, toy drive  
 25 giveaways.

1 Q. Sounds like you do a lot for the betterment  
 2 of mankind.

3 **A. Yes.**

4 Q. Do you use it for social reasons as well?  
 5 I'm still talking about Facebook.

6 **A. Yes.**

7 Q. Like, what socially do you do?

8 **A. Respond to people who make comments.**

9 Q. Pictures? Videos?

10 **A. Yes. I put pictures, yes.**

11 Q. Pictures of you?

12 **A. Yes.**

13 Q. Videos of you, your family, your friends?

14 **A. Yes.**

15 Q. Do you have a Twitter account?

16 **A. Yes.**

17 Q. Under what name?

18 **A. No.**

19 Q. Okay.

20 **A. It's X.**

21 Q. I'm sorry?

22 **A. It's not Twitter.**

23 Q. You're right, it is X now.

24 Do you have an X account?

25 **A. Yes.**

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1 **A. Yes.**  
 2 Q. This is the one we're talking about.  
 3 **A. Yes.**  
 4 Q. This was in real-time, wasn't it?  
 5 **A. Yes.**  
 6 Q. Super.  
 7 And -- and by the way, that was during  
 8 the workday, a day in which you represented to CRU  
 9 that you worked the entire day?  
 10 **A. Yes. And I did. It's at 9:09.**  
 11 Q. Well, you weren't working straight from 8:00  
 12 to 6:00 or whatever hours you said you always worked,  
 13 right?  
 14 **A. Those are the -- I believe on this**  
 15 **deployment, it was on whichever one is --**  
 16 Q. 9:00 start time?  
 17 **A. After, because this is during the morning**  
 18 **meeting.**  
 19 Q. Yeah, I have no idea what you're saying right  
 20 now. Did this --  
 21 **A. So according --**  
 22 Q. Did this occur during the workday?  
 23 **A. Yes, it did.**  
 24 Q. Thank you.  
 25 **A. Can I elaborate on that?**

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1 Q. No, you may not.  
 2 **A. Oh, cool.**  
 3 Q. You continue to waste time and not answer my  
 4 questions.  
 5 MR. HURST: Thank you.  
 6 (Deposition Exhibit No. 13 was marked.)  
 7 Q. (By Mr. Hurst) I'm handing you what has been  
 8 marked as Exhibit No. 13 to your deposition. I will  
 9 represent to you, ma'am, that this is a series of  
 10 printouts of your Facebook activity on Monday, August  
 11 9, 2021, another day on which you represented to CRU  
 12 that you worked the entire day.  
 13 Do you recall Monday, August 9th, 2021?  
 14 **A. No.**  
 15 Q. Do you see on the first page a post you made  
 16 at 9:51 a.m. that day?  
 17 **A. Yes.**  
 18 Q. Who's Ask Shesus?  
 19 **A. That's a group.**  
 20 Q. It's a Facebook group?  
 21 **A. It's a group, yes.**  
 22 Q. Is it not your Facebook group?  
 23 **A. Yes. It was one I created.**  
 24 Q. Aren't you Shesus?  
 25 **A. Yes.**

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1 Q. When I asked you what Facebook accounts you  
 2 had earlier, you didn't mention Ask Shesus. Why not?  
 3 **A. I forgot because they're -- I forgot.**  
 4 Q. Okay. That is an honest answer. I believe  
 5 you.  
 6 Tell me what the purpose of Ask Shesus  
 7 is. It's a group comprised of you and other people?  
 8 **A. Yes.**  
 9 Q. Who else?  
 10 **A. I don't know.**  
 11 Q. You don't know who you formed a Facebook  
 12 group with?  
 13 **A. I formed the group and others joined.**  
 14 Q. Well, how many people are in the group?  
 15 **A. I don't know.**  
 16 Q. It's your group, isn't it?  
 17 **A. Yes, it is.**  
 18 Q. You don't know anyone who's in it; you don't  
 19 know how many are in it?  
 20 **A. I don't know how many are in it.**  
 21 Q. Do you know anyone else in it?  
 22 **A. Other people are in it, but I don't remember**  
 23 **all of their names.**  
 24 Q. Do you remember anybody's name who's in this  
 25 Facebook group you created called Ask Shesus?

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1 **A. No. Because it's not -- it's not even**  
 2 **active. I -- it's been a while since any activity has**  
 3 **been in the group.**  
 4 Q. Okay. Five minutes la- -- let's go to the  
 5 next page.  
 6 Five minutes later you post again, don't  
 7 you.  
 8 **A. Yes.**  
 9 Q. Ask Shesus is not a Facebook group, is it?  
 10 It's just an individual, you?  
 11 **A. Ask Shesus is a Facebook group.**  
 12 Q. It is?  
 13 **A. Yes.**  
 14 Q. It's not an individual like your other  
 15 Facebook accounts?  
 16 **A. No. It's a group.**  
 17 Q. And so you'd be able to click on Ask Shesus  
 18 and see everyone in the group?  
 19 **A. No.**  
 20 Q. Of course not.  
 21 **A. It's a private group.**  
 22 Q. I'm sorry?  
 23 **A. It's a group on -- this is a group on**  
 24 **Facebook.**  
 25 Q. Did you just say it was a private group?

1 that what you're saying?

2 **A. I don't monitor or keep up with how often I**

3 **post.**

4 Q. You don't keep up with how often you post,

5 you just post. Is that what you're saying?

6 **A. Just post.**

7 Q. Kind of do what you do.

8 Okay. Let's shift gears. You've been an

9 employee and an independent contractor. Which one do

10 you like being more, an employee or an independent

11 contractor?

12 **A. They're both equally the same.**

13 Q. Each time you were deployed by CRU, you

14 understood that you would be performing work as an

15 independent contractor, correct?

16 **A. Yes.**

17 Q. Each time you were deployed by CRU, you

18 understood that CRU would pay you for your services

19 and would at the end of year issue a form 1099?

20 **A. Yes.**

21 Q. You would then use that form 1099 to file

22 your taxes with the U.S. Internal Revenue Service,

23 correct?

24 **A. No. I haven't filed.**

25 Q. You haven't filed taxes?

1 **A. No.**

2 Q. When was the last time you filed taxes, if

3 ever?

4 **A. I have -- I don't remember the last time.**

5 Q. So you didn't file taxes for 2022?

6 **A. No.**

7 Q. You didn't file taxes for 2021?

8 **A. No.**

9 Q. You didn't file taxes for 2020?

10 **A. Yes -- I'm not sure.**

11 Q. Are you getting notices from the government

12 saying you owe money and you are required to file for

13 taxes?

14 **A. No.**

15 Q. You haven't heard from the IRS?

16 **A. No.**

17 Q. Do you think it's okay to not file taxes?

18 **A. No.**

19 Q. So you know you need to file taxes?

20 **A. Yes.**

21 Q. Do you intend to do so?

22 **A. Yes.**

23 Q. Who's your accountant or tax preparer?

24 **A. I haven't found one yet.**

25 Q. Are you even trying to find one?

1 **A. Yes.**

2 Q. Is it a priority?

3 **A. Yes.**

4 Q. How long have you been trying to find a tax

5 preparer?

6 **A. For, like, the last couple of months.**

7 Q. And you haven't found one yet?

8 **A. No.**

9 Q. You understand that a form 1099 is to submit

10 to the government, though, right?

11 **A. Yes.**

12 Q. Each time you were deployed by CRU, you

13 understood that CRU would not be withholding taxes

14 from your compensation, correct?

15 **A. Correct.**

16 Q. Each time you were deployed by CRU, you

17 understood that you would be responsible for all tax

18 obligations arising from your performance of services

19 for CRU?

20 **A. Yes.**

21 Q. You haven't claimed any business expenses?

22 **A. No.**

23 Q. Do you have a high school degree -- or

24 diploma?

25 **A. Yes.**

1 Q. From where?

2 **A. Captain Shreve.**

3 Q. I'm sorry?

4 **A. Captain Shreve.**

5 Q. Are you saying Shreve?

6 **A. Yes.**

7 Q. S-H-R...

8 **A. -- E-V-E.**

9 Q. Is that in Shreveport?

10 **A. Yes.**

11 Q. And when did you graduate from high school?

12 **A. '96.**

13 Q. Have you taken college courses?

14 **A. Yes.**

15 Q. Where?

16 **A. LSU, Southern, Lone Star.**

17 Q. Do you have a college degree?

18 **A. I haven't completed it.**

19 Q. What are you working toward?

20 **A. Accounting.**

21 Q. When was the last time you took a college

22 course?

23 **A. 20- -- oh, gosh, I can't remember.**

24 Q. Well, do you plan on finishing?

25 **A. Yes.**

## ORAL AND VIDEOTAPED DEPOSITION OF CARLA COLLINS

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1 **A. Normally, yes. But sometimes they were not.**  
 2 Q. And when they weren't, would you fix whatever  
 3 your team lead said was keeping it from being approved  
 4 and resubmit it, and then it then it was approved?  
 5 **A. Yes.**  
 6 Q. You say that you are on your way to getting  
 7 an accounting degree.  
 8 **A. Yes.**  
 9 Q. And you say you're about a year and a half  
 10 short of obtaining it and you plan to do so one day?  
 11 **A. One day. I have other things planned.**  
 12 **(Reporter clarification.)**  
 13 Q. (By Mr. Hurst) In all fairness, isn't filing  
 14 taxes an important part of an accountant's perspective  
 15 and what an accountant does for a living?  
 16 **A. If you're a tax accountant, yeah, but if you**  
 17 **do other stuff, then no.**  
 18 Q. Would you agree that filing taxes is  
 19 important for accountants?  
 20 **A. Yes.**  
 21 MR. HURST: Okay. We are going to pass  
 22 the witness during this phase one deposition at this  
 23 time.  
 24 MR. GASPER: No further questions. We'll  
 25 read and sign.

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1 MR. HURST: Thank you.  
 2 THE VIDEOGRAPHER: We are off record at  
 3 7:28 p.m.  
 4 (Deposition adjourned at 7:28 p.m.)  
 5  
 6  
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1 CHANGES AND SIGNATURE  
 2 WITNESS NAME: CARLA MARIE COLLINS OCTOBER 19, 2023  
 3 PAGE LINE CHANGE REASON  
 4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_  
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 23 \_\_\_\_\_  
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 25 \_\_\_\_\_

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1 I, CARLA MARIE COLLINS, have read the  
 2 foregoing deposition and hereby affix my signature  
 3 that same is true and correct, except as noted above.  
 4  
 5 \_\_\_\_\_  
 6 CARLA MARIE COLLINS  
 7  
 8  
 9  
 10 THE STATE OF \_\_\_\_\_)  
 11 COUNTY OF \_\_\_\_\_)  
 12 Before me, \_\_\_\_\_, on this  
 13 day personally appeared CARLA MARIE COLLINS, known to  
 14 me (or proved to me under oath or through  
 15 \_\_\_\_\_) (description of identity card or  
 16 other document) to be the person whose name is  
 17 subscribed to the foregoing instrument and  
 18 acknowledged to me that they executed the same for the  
 19 purposes and consideration therein expressed.  
 20 Given under my hand and seal of office this  
 21 \_\_\_\_\_ day of \_\_\_\_\_, 2023.  
 22  
 23  
 24 \_\_\_\_\_  
 25 NOTARY PUBLIC IN AND FOR  
 THE STATE OF \_\_\_\_\_

ORAL AND VIDEOTAPE DEPOSITION OF CARLA COLLINS

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1 STATE OF TEXAS )  
2 COUNTY OF DALLAS )  
3 I, Kathy E. Weldon, Certified Shorthand  
4 Reporter, in and for the State of Texas, certify that  
5 the foregoing deposition of CARLA MARIE COLLINS was  
6 reported stenographically by me at the time and place  
7 indicated, said witness having been placed under oath  
8 by me, and that the deposition is a true record of the  
9 testimony given by the witness.

10 I further certify that I am neither counsel  
11 for nor related to any party in this cause and am not  
12 financially interested in its outcome.

13 Given under my hand on this the \_\_\_\_\_ day of  
14 \_\_\_\_\_, 2023.



15 Kathy E. Weldon  
16 Kathy E. Weldon  
17 Shorthand Reporter No. 6166  
18 Dickman Davenport, Inc.  
19 Firm Registration #312  
20 Suite 101  
21 4228 North Central Expressway  
22 Dallas, Texas 75206  
23 214.855.5100 | 800.445.9548  
24 My commission expires 10-31-25  
25

22 Time used by each party:  
23 Mr. Travis Gasper - 0:00  
24 Mr. Monte K. Hurst - 6:15  
25